

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JACOB GARCIA,

Plaintiff,

V.

COURT FILE NO. 5:21-cv-00080

MERCHANTS AND PROFESSIONAL
BUREAU, INC. d/b/a MERCHANTS AND
PROFESSIONAL COLLECTION BUREAU,
INC.

Defendants.

NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. § 1441
(FEDERAL QUESTION)

TO THE HONORABLE JUDGE OF SAID COURT:

PLEASE TAKE NOTICE that Defendants Merchants and Professional Bureau, Inc. (“Defendant”) hereby remove to this Court the state court action described below.

1. On March 13, 2017, the plaintiff commenced an action in the District Court, Bexar County, Texas, entitled *Jacob Garcia v Merchants and Professional Bureau, Inc* bearing cause number 2021-CI-00134. A copy of the citation and original petition served on Defendant is attached and marked as Exhibit A. A copy of Defendant's Answer is attached and marked as Exhibit B. To the best of the undersigned's knowledge, no other pleadings or documents, other than the documents attached hereto.

2. This action is a civil action of which this Honorable Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by Defendant pursuant to 28 U.S.C. § 1441 in that it presents a federal question, in that Plaintiff

alleges violations of 15 U.S.C. § 1692 *et seq.*, the Fair Debt Collection Practices Act (“FDCPA”).

3. Defendant was served on January 25, 2021, this removal is timely pursuant to 28 U.S.C. § 1446.

4. Also, attached as Exhibit C is a copy of the Docket sheet in the District Court.

5. As required by 28 U.S.C. § 1446, Defendant will give notice of the filing of this notice to the Plaintiff and to the clerk of the District Court, Bexar County Texas, where the action is currently pending.

WHEREFORE, Defendant respectfully request that the above captioned matter currently pending in the District Court, Bexar County Texas be removed to this Honorable Court.

Respectfully submitted,

SANDER LAW OFFICES, PLLC

By: /s/ David C. Sander

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2021, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Western District of Texas, using the electronic case filing system of the court.

I further certify that a true and correct copy of the foregoing document was sent by fax to the following on February 1, 2021:

William Clanton
Law Offices of Bill Clanton, PC
926 Chulie Dr.
San Antonio, Texas 78216
Fax No. 210-338-8660

/s/ David C. Sander
David C. Sander